

The petition would give on-air 'practice' privileges to individuals who have never passed a practical test. CW is an essential fallback mode for communications;

The very purpose of Amateur Radio in the US is to provide Emergency Communications capability.

When conditions are poor, CW can be sent, even from the TouchTone Pad on a VHF/UHF HT. If CW is no longer required, Amateur Radio emergency capabilities will degrade unnecessarily.